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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION**

JANE DOE, on behalf of
herself and all others similarly
situated,

Plaintiff

vs

PHE, INC. AND GOOGLE LLC,

Defendants

Case No. 2:24-cv-01065-RGK-SK

Hon. R. Gary Klausner

**RESPONSE TO COURT'S ORDER TO SHOW CAUSE WHY PLAINTIFF
SHOULD BE PERMITTED TO PROCEED BY PSEUDONYM**

INTRODUCTION

Plaintiff Jane Doe, on behalf of herself and all others similarly situated, by and through counsel, submits this response to the Court's Order to Show Cause dated February 29, 2024 ([Doc. No. 25]). On February 14, 2024, the Court previously ordered Plaintiff to show cause why she should be permitted to proceed by pseudonym. ([Doc. No. 17]). Plaintiff submitted a response to the February 14 Order to Show Cause on February 21, 2024 ([Doc. No. 24]). Plaintiff respectfully refers the Court to her Response to the Court's Prior Order to Show Cause for a full recitation of the relevant facts and case law in support of Plaintiff's request that the Court permit her to proceed by pseudonym. Namely, there are highly personal privacy concerns at issue in this case, as demonstrated in the pleadings, pertaining to Plaintiff's personal sexual history, orientation, and preferences.

As mentioned in Plaintiff's Response to the Court's February 14 Order to Show Cause, this action was previously filed in state court as Plaintiff believes that is the forum in which this case properly belongs. Plaintiff respectfully requests that the Court refrain from ruling on this Order to Show Cause until after the Court rules on Plaintiff's Motion for Remand which, pursuant to the Court's Order Granting the Parties' Joint Stipulation to set a Briefing Schedule for Plaintiff's Motion to Remand, shall be filed by March 8, 2024. (*See* [Doc. No. 23]). However, should the Court rule on this issue prior to rendering a decision on Plaintiff's jurisdictional challenges, the Court should permit Plaintiff to proceed by pseudonym based on the highly personal privacy concerns discussed in Plaintiff's response to the Court's prior Order to Show Cause ([Doc. No. 24]).

CONCLUSION

For the foregoing reasons, Plaintiff respectfully submits that this Court should permit her to proceed by pseudonym in this matter. Plaintiff's allegations are inextricably tied to her personal sexuality, including but not limited to her sexual orientation and preferences, as demonstrated in Plaintiff's prior Response to the

Court's original Order to Show Cause (*See* [Doc. No. 24]). Defendants will not be prejudiced by Plaintiff's anonymity as Defendants will be privately made aware of Plaintiff's identity and the public's interest will be served by enabling the case to go forward and be tried on its merits.

Dated: March 7, 2024
Detroit, Michigan

Respectfully submitted,

/s/ Nicholas A. Coulson

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